

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
TALEN ENERGY SUPPLY, LLC, <i>et al.</i> ,	§	Case No. 22-90054 (MI)
	§	
Debtors. ¹	§	(Jointly Administered)
	§	Re: Docket No. 17
	§	

**NOTICE OF FILING OF FURTHER REVISED PROPOSED INTERIM ORDER
(A) AUTHORIZING THE DEBTORS TO OBTAIN POST-PETITION
FINANCING, (B) AUTHORIZING THE DEBTORS TO USE CASH
COLLATERAL, (C) GRANTING LIENS AND PROVIDING CLAIMS
WITH SUPERPRIORITY ADMINISTRATIVE EXPENSE STATUS,
(D) GRANTING ADEQUATE PROTECTION TO THE PREPETITION
FIRST LIEN SECURED PARTIES, (E) MODIFYING THE AUTOMATIC STAY,
(F) SCHEDULING A FINAL HEARING, AND (G) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT, on May 10, 2022, Talen Energy Supply, LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Emergency Motion of Debtors for Interim and Final Orders (A) Authorizing the Debtors to Obtain Post-Petition Financing, (B) Authorizing the Debtors to Use Cash Collateral, (C) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition First Lien Secured Parties, (E) Modifying the Automatic Stay, (F) Scheduling A Final Hearing, and (G) Granting Related Relief* (Docket No. 17) (the “**Motion**”), with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the “**Initial Interim Proposed Order**”).

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/talenenergy>. The Debtors’ primary mailing address is 1780 Hughes Landing Boulevard, Suite 800, The Woodlands, Texas 77380.

PLEASE TAKE FURTHER NOTICE THAT, on May 10, 2022, the Debtors filed a revised proposed *Interim Order (A) Authorizing the Debtors to Obtain Post-Petition Financing, (B) Authorizing the Debtors to Use Cash Collateral, (C) Granting Liens And Providing Claims with Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition First Lien Secured Parties, (E) Modifying the Automatic Stay, (F) Scheduling A Final Hearing, and (G) Granting Related Relief*, (Docket No. 110) (the “**First Revised Proposed Interim Order**”).

PLEASE TAKE FURTHER NOTICE THAT, the Debtors hereby file a further revised proposed *Interim Order (A) Authorizing the Debtors to Obtain Post-Petition Financing, (B) Authorizing the Debtors to Use Cash Collateral, (C) Granting Liens And Providing Claims with Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition First Lien Secured Parties, (E) Modifying the Automatic Stay, (F) Scheduling A Final Hearing, and (G) Granting Related Relief*, attached hereto as **Exhibit A** (the “**Second Revised Proposed Interim Order**”), which reflects revisions requested by the Court.

PLEASE TAKE FURTHER NOTICE THAT, a change-page only redline of the Revised Proposed Interim Order marked against the Initial Proposed Interim Order is attached hereto as **Exhibit B**.

Dated: May 10, 2022
Houston, Texas

Respectfully submitted,

/s/ Gabriel A. Morgan

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*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on May 10, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' proposed claims, noticing, and solicitation agent.

/s/ Gabriel A. Morgan
Gabriel A. Morgan